

COHEN & GREEN

February 22, 2024

ECF

Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: Thorn Lawless v. City of New York, et al.; Index no. 1:23-cv-09106-VEC

Your Honor:

This firm represents the Plaintiff. We write to respectfully request an extension of time to amend the complaint to name the Doe Defendants from today's deadline up to and including March 29, 2024. The reason for this request is because the Defendants have not provided all of the names of all Doe Defendants. We are in the process of conferring with the Defendants to obtain this information. I emailed defense counsel about this issue yesterday and have not heard back from him. I followed up by email and phone today, but have received no response. Defendants did produce some paperwork that indicates a partial name for one of the Doe Defendants. Plaintiff will amend the complaint today to reflect that partial information. However, Plaintiff respectfully requests that the Court grant this request because we have not received all information necessary to completely amend the complaint to name the Doe Defendants. We thank the Court for its time and consideration.

Respectfully submitted,

/s/

Jessica Massimi, Esq.
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Enclosures.



Application GRANTED. Plaintiff's deadline to file an amended complaint is extended from Thursday, February 22, 2024, to **Friday, March 29, 2024**.

SO ORDERED.

2/22/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE